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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendant.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF  
ARTURO J. GONZALEZ IN  
SUPPORT OF DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S MOTION TO  
COMPEL DEPOSITIONS**

Judge: The Honorable William Alsup

Trial Date: October 10, 2017

1 I, Arturo J. González, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in  
3 good standing of the Bar of the State of California. I make this declaration based on personal  
4 knowledge and, if called as a witness, I could and would testify competently to the matters set  
5 forth herein. I make this declaration in support of Defendants Uber Technologies, Inc. and  
6 Ottomotto LLC's Opposition to Waymo's Motion to Compel Depositions.

7 2. Attached as **Exhibit 1** are relevant pages from the depositions of Asheem Linaval  
8 taken on April 13, 2017 and August 15, 2017.

9 3. Attached as **Exhibit 2** are relevant pages from the depositions of Daniel Gruver,  
10 taken on April 20, 2017 and August 4, 2017.

11 4. Attached as **Exhibit 3** are relevant pages from the deposition of James Haslim,  
12 taken on April 18, 2017.

13 5. Attached as **Exhibit 4** are relevant pages from the deposition of Maxime  
14 Levandowski, taken on July 18, 2017.

15 6. Attached as **Exhibit 5** is a true and correct copy of excerpted pages from  
16 Defendants' Amended Second Supplemental Privilege Log Associated with March 31, 2017  
17 Production of Documents, served on April 27, 2017.

18 7. Attached as **Exhibit 6** is a true and correct copy of a document produced in this  
19 litigation bearing Bates numbers UBER00017249-UBER00017264.

20 8. Attached as **Exhibit 7** is a true and correct copy of a document produced in this  
21 litigation bearing Bates numbers UBER00322231- UBER00322234.

22 9. Attached as **Exhibit 8** is a true and correct copy of a document produced in this  
23 litigation bearing Bates numbers UBER00321505- UBER00321511.

24 10. Attached as **Exhibit 9** is a true and correct copy of a document produced in this  
25 litigation bearing Bates numbers UBER00319670-UBER00319677.

26 11. Attached as **Exhibit 10** are relevant pages from the deposition of Nina Qi, taken  
27 on June 22, 2017.  
28

12. Attached as **Exhibit 11** are relevant pages from the 30(b)(6) deposition of Adam Bentley taken on August 22, 2017.

13. Attached as **Exhibit 12** is a true and correct copy of an excerpted page from Defendants' Privilege Log Associated with March 31, 2017 Production of Documents, served on April 10, 2017.

14. Attached as **Exhibit 13** is a true and correct copy of an excerpted page from Defendants' Privilege Log Associated with March 31, 2017 Production of Documents, served on April 28, 2017.

15. Attached as **Exhibit 14** is a true and correct copy of Plaintiff Waymo LLC's 30(b)(6) Notice to Uber and Ottomotto, served on July 20, 2017.

16. Attached as **Exhibit 15** is a true and correct copy of Defendants Uber Technologies, Inc. and Ottomotto LLC's Amended Initial Disclosures, served on June 21, 2017.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26<sup>th</sup> day of September, 2017 at San Francisco, California.

/s/ Arturo J. González

ARTURO J. GONZÁLEZ